

September 9, 2010

Ms. Sharon Fang, P.E.
Remedial Project Manager (3HS21)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

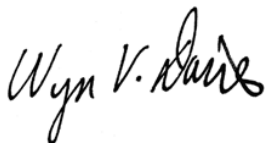
Re: Metal Bank Cottman Avenue NPL Site
Monthly Report due September 10, 2010
Reporting Period: August 1 through August 31, 2010

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,
MALCOLM PIRNIE, INC.



Wyn V. Davies, CIH
Senior Associate

Cc: Cottman Avenue PRP Group
Steering and Technical Committees
Joseph Vitale, P.E.
Raymond E. Lees, P.E., CHMM
Dan J. Jordanger, Esquire

Enclosures
3809012



Project Name: Metal Bank NPL Site	For the Month: August 2010	
Project Location: Philadelphia, PA	Report Number: 53	Dated: September 9, 2010

Name: Wyn Davies (Malcolm Pirnie, Inc.)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817

Reporting Period: August 1 through August 31, 2010

(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:

Remedial action monitoring continued throughout the month of August. Activities included the following:

- Performance and completion of the repair to Building 7 epoxy coating of floor
- Inspected Building 7 for epoxy condition post repairs
- Performed the reseedling of the landfill cap areas on August 12 & 13, 2010
- Installed the tiltmeters, on August 24th, in three locations along the sheet pile wall for long term monitoring of verticality of each zone of sheeting
- Performed the tie rod epoxy repairs and sheet pile wall repair painting during weeks of August 16th and 23rd
- Performed a post significant rain event inspection on August 24, 2010
- Met with the well driller to assess the verticality of MW-5 on August 24th
- Performed the herbicide treatment of invasive plants on August 27th
- Maintained soil erosion & sedimentation control aspects
- Provided access to the site for the US EPA to monitor the post-construction work related to the approved Severson RAWP.

(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:

None

(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:

- Cottman Ave PRP Group to EPA – EPA provided notice for the commencement of the re-seeding of the landfill cap on August 12th (8/4/10)
- Cottman Ave PRP Group to EPA – The Group submitted the response to comments on the conditional approval of the biota QAPP (8/6/10)
- Cottman Ave PRP Group to EPA – The Group submitted the revised Long Term Monitoring Report and Final biota QAPP (8/6/10)
- Cottman Ave PRP Group to EPA – The Group submitted the data validation summary report for the PCB data obtained during the TetraTech EC construction phase of the work

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<p>to complete Appendix K of the Engineer's Certification Report submitted in May (8/12/10)</p> <ul style="list-style-type: none"> EPA to Cottman Ave PRP Group – EPA submitted a letter regarding the need for a potential fish and eel study as part of the LTM and provided a report from the Region III Environmental Services Assistance Team regarding PCB Congener results for fish/eel that were collected in August 2009. (8/19/10)
<p>(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:</p>
<p>The current month look-ahead schedule for O&M is attached.</p> <p>The Utility Group will continue monitoring the post construction activities including:</p> <ul style="list-style-type: none"> Inspect the new epoxy in Building 7 (floor) Perform sheet pile wall monitoring Perform the mechanical eradication of invasive plant species after herbicide treatment Maintain the soil & erosion aspects Monitor the LNAPL Trench Sumps for free product Prepare for the second round of groundwater monitoring Continue monitoring of site for HSE compliance
<p>(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:</p>
<ul style="list-style-type: none"> All O&M commitments are on schedule
<p>(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:</p>
<ul style="list-style-type: none"> none
<p>(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:</p>
<ul style="list-style-type: none"> The Group will coordinate with EPA on any community outreach endeavors on an as needed basis through the post construction period.

Metal Bank - Post Construction Schedule

ID	Task Name	Duration	Start	Finish	September					October				November
					8/29	9/5	9/12	9/19	9/26	10/3	10/10	10/17	10/24	10/31
1	Post Construction Inspections	111 days	Wed 2/3/10	Wed 7/7/10										
14	Comments on LTM	14 days	Mon 5/10/10	Thu 5/27/10										
15	EPA/Cottman PRP Final Inspection	1 day	Thu 4/29/10	Thu 4/29/10										
16	Submittal of Engineer Certification Report	1 day	Fri 5/28/10	Fri 5/28/10										
17	EPA Comments on Groundwater QAPP	5 days	Mon 5/17/10	Fri 5/21/10										
18	LTM Biota QAPP	93 days	Wed 3/31/10	Fri 8/6/10										
19	Commencement of LTM	1132 days	Mon 7/26/10	Tue 11/25/14										
20	Groundwater Monitoring	1114 days	Mon 7/26/10	Thu 10/30/14										
39	Sheet Pile Wall Monitoring	1112 days	Mon 8/23/10	Tue 11/25/14										
91	Complete Action Items from Final Inspection	30 days	Fri 4/30/10	Thu 6/10/10										
92	PRP and EPA Approval of Invasive Species Control Plan	14 days	Wed 7/21/10	Mon 8/9/10										
93	Invasive Species Herbicide Treatment - Milnor St.	2 days	Mon 8/23/10	Tue 8/24/10										
94	Invasive Species (Knot Weed) Treatment along Delaware River Bank	3 days	Wed 8/25/10	Fri 8/27/10										
95	Mechanically Eradicate Invasive Plants that have been treated	2 days	Wed 9/29/10	Thu 9/30/10										
96	Evaluation of Native Grass Germination	1 day	Wed 9/29/10	Wed 9/29/10										
97	Overseed Drilling of Native grasses (If necessary)	4 days	Mon 8/23/10	Thu 8/26/10										

Project: Metal Bank Post Construction
Date: Wed 9/1/10

Task		External Milestone		Manual Summary Rollup	
Split		Inactive Task		Manual Summary	
Milestone		Inactive Milestone		Start-only	
Summary		Inactive Summary		Finish-only	
Project Summary		Manual Task		Progress	
External Tasks		Duration-only		Deadline	